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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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July 9, 2026

Timothy Johnston
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Subject: Old Moccasin Powerhouse Hazard Mitigation Project (Project)
Notice of Preparation (NOP)
SCH No.: 2026060680

Dear Timothy Johnston:

The California Department of Fish and Wildlife (CDFW) received an NOP of a Draft Environmental Impact Report (DEIR) from the City and County of San Francisco (San Francisco Planning) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

Nesting Birds: CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include sections 3503 (regarding unlawful take, possession, or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

Fully Protected Species: CDFW has jurisdiction over fully protected species of birds, mammals, amphibians and reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. Fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except as follows:

- Take is for necessary scientific research,
- Efforts to recover a fully protected, endangered, or threatened species, live capture, and relocation of a bird species for the protection of livestock, or
- They are a covered species whose conservation and management is provided for in a Natural Community Conservation Plan (Fish & G. Code, §§ 3511, 4700, 5050, & 5515).

Unlisted Species: Species of plants and animals need not be officially listed as Endangered, Rare, or Threatened (E, R, or T) on any State or Federal list to be considered E, R, or T under CEQA. If a species can be shown to meet the criteria for E, R, or T, as specified in the CEQA Guidelines section 15380, CDFW recommends it be fully considered in the environmental analysis for the Project.

PROJECT DESCRIPTION SUMMARY

Proponent: City and County of San Francisco

Objective: The Project proposes to demolish the Old Moccasin Powerhouse due to on-going structural deficiencies and the presence of hazardous materials. The Project

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would remove the Old Moccasin Powerhouse structure, and the basement would be filled and site leveled. Site restoration would also occur and would include site cleanup and demobilization.

Location: The Project site is located within Tuolumne County, in the rural unincorporated town of Moccasin near the junction of State Route (SR) 49 and SR 120, about eight miles east of the Town of Groveland. The Project site is located within Assessor's Parcel Number (APN) 057-070-003.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist San Francisco Planning in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the DEIR prepared for this Project.

The NOP states the Project is located immediately adjacent to the Moccasin Reservoir (Reservoir), which stores water and conveys it through Moccasin Creek as it flows from northwest to southeast. Based on aerial imagery, several residential and commercial buildings surround the immediate Project site. Within the Project vicinity, habitats include oak and foothill woodlands, comprised of a mix of blue oak (*Quercus douglassii*), interior live oak (*Quercus wislizeni*), foothill pine (*Pinus sabiniana*), whiteleaf manzanita chaparral (*Arctostaphylos viscida*), and annual grasslands.

Based on a review of the NOP and aerial imagery of the Project site and surrounding habitat, the Project site is within the geographic range of, and has the potential to impact, several special-status animal species, including but not limited to: the State endangered and fully protected bald eagle (*Haliaeetus leucocephalus*); the State endangered great gray owl (*Strix nebulosa*); the State and federally endangered foothill yellow-legged frog South Sierra Distinct Population Segment (DPS) (*Rana boylii* pop.5); the State species of special concern pallid bat (*Antrozous pallidus*); spotted bat (*Euderma maculatum*); Townsend's big-eared bat (*Corynorhinus townsendii*); western mastiff bat (*Eumops perotis californicus*); and western red bat (*Lasiurus frantzi*); the State species of special concern and federally proposed threatened northwestern pond turtle (*Actinemys marmorata*); the State species of special concern and federally threatened Lahontan cutthroat trout (*Oncorhynchus henshawi henshawi*); and the State watch list osprey (*Pandion haliaetus*).

Special-Status Bats

Special-status bat species including, but not limited to, the pallid bat (PAB), spotted bat, Townsend's big-eared bat, western mastiff bat (WMB), and western red bat (WRB) are known to occur within the Project vicinity and PAB, WMB, and WRB have historical occurrences documented within the general area of the Project site. Known roosting habitats include mines, caves, rocky outcrops, bridges, trees, and buildings. Roost sites

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are often known to support multiple bat species within a roost, and many bat species have similar life histories. The Old Moccasin Powerhouse is likely to provide ideal roosting habitat for special-status bats, including the species listed above.

To minimize potential Project-related impacts to special-status bat species, CDFW recommends that a qualified biologist conduct focused surveys for roosting bats within the Project site as part of the biological technical studies conducted in support of the DEIR to establish species usage and seasonal usage. Focused survey methodology is advised to include visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (guano), and use of ultrasonic detectors (Anabat, Sonobat, etc.) during all dusk emergence and pre-dawn re-entry. To maximize detectability, each survey needs to be conducted within one 24-hour period.

In addition to conducting focused bat surveys to inform the DEIR, CDFW recommends the DEIR include the following measures:

> **Recommended Mitigation Measure 1: Special-Status Bat Focused Surveys**
> CDFW recommends that a qualified biologist conduct focused surveys immediately prior to Project implementation. Focused survey methodology is advised to include visual surveys of bats (observation of presence of bats during foraging period), inspection for suitable habitat or bat sign (guano), and use of ultrasonic detectors (Anabat, Sonobat, etc.) during all dusk emergence and pre-dawn re-entry. To maximize detectability, each survey needs to be conducted within one 24-hour period.
>
> **Recommended Mitigation Measure 2: Bat Roost Disturbance Avoidance and Minimization**
> If bats are present, CDFW recommends that a 100-foot no-disturbance buffer be placed around the roost, and if the roost site is anticipated to be removed, CDFW recommends installing new roost sites, which would be in place prior to the initiation of demolition to allow enough time for bats to relocate. If a bat roost is identified and work is planned to occur during the species breeding season, CDFW recommends that no disturbance to maternity roosts occur and that CDFW be consulted to determine measures to prevent breeding disruption or failure.

Special-status Raptors

Special-status raptor species including, but not limited to, bald eagle (BAEA), great gray owl (GGOW), and osprey (OSPR) are known to occur within the Project vicinity. BAEA and GGOW have historical occurrences documented within 10 miles of the Project site. BAEA are frequently documented nesting within close proximity of large water bodies, though individuals have also been documented nesting within the vicinity of smaller aquatic features and riverine features (CDFW 2026), and nesting has been observed up to approximately 3 miles from foraging habitat (Airola et al. 2025). GGOW breed within the pine and fir forests of the Sierra Nevada Mountains and may move into oak

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woodland habitats in lower elevations to breed or winter (Wu et al., 2016). OSPR are associated with large, fish-bearing waters within ponderosa pine to mixed conifer habitats and use large trees, snags, and dead-topped trees in open forest habitats for cover and nesting.

As these species have the potential to occur within the Project vicinity, CDFW recommends that the DEIR analyze potential indirect impacts, such as noise and vibration associated with demolition activities, to determine whether Project activities have the potential to impact special-status raptors nesting within the area. If it is determined that Project activities have the potential to impact special-status species within the Project vicinity, CDFW recommends that that the DEIR incorporate appropriate mitigation measures, such as limiting high acoustic impact activities within the nesting season. CDFW also recommends that a qualified biologist conduct a habitat assessment within the Project site, and an approximately ½-mile buffer surrounding the Project, to determine whether suitable nesting habitat is present for the special-status raptors referenced above. If suitable habitat is determined to be present, CDFW further recommends that a qualified biologist conduct focused surveys to identify any active nests. Focused surveys should follow the methods outlined in the Protocol for Evaluating Bald Eagle Habitat and Populations in California (Jackman and Jenkins 2004) and the Survey Protocol for the Great Gray Owl in the Sierra Nevada of California (USFS 2000) as appropriate. If surveys indicate the presence or potential presence of BAEA, GGOW, and OSPR, consultation with the CDFW is recommended for guidance on mitigation measures such as avoidance, minimization, and mitigation. If BAEA or GGOW is detected, consultation with CDFW is recommended for guidance on how to implement the Project and avoid take of the species or for guidance on obtaining an ITP, pursuant to Fish and Game Code section 2081 subdivision (b).

Special-status Amphibians, Reptiles, and Fish

Many amphibians, reptiles, and fish species utilize Moccasin Creek, including foothill yellow-legged frog (FYLF), northwestern pond turtle (WPT), and Lahontan cutthroat trout (LCT). FYLF are primarily stream-dwelling and require shallow, flowing water in streams and rivers with at least some cobble-sized substrate for breeding (Thomson et al. 2016). NWPT use a variety of aquatic and adjacent habitats, including streams, ponds, irrigation canals, and riparian and upland areas for nesting, overwintering, dispersal, and basking. WPT are known to nest in the spring or early summer within 100 meters of a water body, although nest sites as far away as 500 meters have also been reported (Thomson et al. 2016). LCT are one of several species reared at the Moccasin Creek Hatchery (Hatchery) to be released to select waters in the Lake Tahoe drainage.

The NOP indicates that Project activities would include lowering Reservoir levels during demolition activities to ensure dust, debris, sediment, and other contaminants do not enter into the Reservoir. The DEIR also mentions that best management practices would be implemented to further prevent potential discharges. While CDFW concurs with this approach, there is the potential that the temporary Reservoir lowering could

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impact the hydrology (e.g. flow, water level, turbidity, etc.) of Moccasin Creek upstream and downstream of the Reservoir.

Aquatic species, such as FYLF and NWPT, depend on local seasonal conditions to support their breeding cycle, and both acute and prolonged disturbances to hydrological conditions could potentially significantly impact fish, amphibian, and reptile species. As such, CDFW recommends the DEIR include a robust analysis of potential impacts to Moccasin Creek and species such as FYLF and NWPT, from the proposed Project activities and include a detailed hydrological study of Project-related changes to the Moccasin Creek watershed. CDFW also recommends that the Project time Reservoir lowering, and any associated hydrologic disturbances to Moccasin Creek, during time periods outside of the typical breeding and spawning seasons for the aquatic species that are present within Moccasin Creek. To further assist with the timing of Reservoir lowering, CDFW recommends that San Francisco Planning coordinate with CDFW on anticipated Reservoir lowering dates to assist with determining appropriate hydroperiods to reduce impacts to aquatic species. See below for specific recommendations related to LCT and other fish species that are raised at the Hatchery.

Moccasin Creek Hatchery

The Moccasin Creek Hatchery is located along the western end of the Reservoir and currently rears both special-status and recreational fish species including brown trout (*Salmo trutta*), rainbow trout (*Oncorhynchus mykiss*) and LCT. Project activities, which include the lowering of the Reservoir, have the potential to impact CDFW's ongoing hatchery operations and rearing efforts from effects such as sediment discharge, reduced flows, and reduced water quality. As such, CDFW recommends San Francisco Planning coordinate closely with CDFW management and hatchery staff well before and during Project implementation. For information on the Moccasin Creek Hatchery, please refer to CDFW's website (https://wildlife.ca.gov/Fishing/Hatcheries/Moccasin-Creek). For the CDFW contact needed for hatchery coordination, please reach out to Justin Kroeze, Fish Hatchery Manager II, at (209) 989-2312.

Editorial comments and/or suggestions

Nesting Birds: CDFW encourages that Project ground-disturbing activities occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the nesting season (February 1st through September 15th), the Project proponent is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Code sections as referenced above.

CDFW recommends that a qualified biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to

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identify nests and determine their status. A sufficient area means any area potentially affected, either directly or indirectly, by the Project. In addition to direct impacts (i.e., nest destruction), noise, vibration, and movement of workers or equipment could also affect nests. CDFW recommends that a qualified biologist establish a behavioral baseline of all identified nests. Once Project activities begin, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

CDFW recommends if continuous monitoring of identified nests by a qualified biologist is not feasible, a no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is a compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

Water Pollution: The NOP notes that the Moccasin Reservoir, is less than 50 feet from Project related demolition activities and that the Project would avoid impacts to reservoir, specifically stating that, "The reservoir would be protected from contamination associated with demolition of the powerhouse, by lowering reservoir levels and implementation of construction best management practices to control dust and prevent runoff." Pursuant to Fish and Game Code Section 5650, it is unlawful to deposit in, permit to pass into, or place where it can pass into "Waters of the State" any substance or material deleterious to fish, plant life, or bird life, including non-native species. It is possible that without mitigation measures this Project could result in pollution of a "Waters of the State" from increased sediment and hazardous waste; discharge of other constituents of concern such as endocrine disruptors; or construction related erosion. This could impact the fish and wildlife resources that utilize the reservoir. The Regional Water Quality Control Board and U.S. Army Corps of Engineers also has jurisdiction regarding discharge and pollution to "Waters of the State". As such, CDFW recommends that best management practices be implemented to ensure minimal run-off and sediment delivery into the reservoir and to ensure all State and federal agency requirements are met.

Lake and Streambed Alteration: The NOP notes the Project site is adjacent to the Moccasin Reservoir, which stores water and conveys it through Moccasin Creek as it flows from northwest to southeast. Project activities that substantially change the bed, bank, and channel of any river, stream or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that

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may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation): (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. “Any river, stream, or lake” includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement; therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for Lake or Streambed Alteration Agreement issuance. For information on notification requirements, please refer to CDFW’s website (https://wildlife.ca.gov/Conservation/LSA) or contact CDFW staff in the Central Region Lake and Streambed Alteration Program at (559) 243-4593.

Cumulative Impacts: CDFW recommends that a cumulative impact analysis be conducted for all biological resources that will either be significantly or potentially significantly impacted by implementation of the Project, including those whose impacts are determined to be less than significant with mitigation incorporated or for those resources that are rare or in poor or declining health and will be impacted by the Project, even if those impacts are relatively small (i.e., less than significant). Cumulative impacts are recommended to be analyzed using an acceptable methodology to evaluate the impacts of past, present, and reasonably foreseeable future projects on resources and be focused specifically on the resource, not the Project. An appropriate resource study area should also be identified and mapped for each resource being analyzed and utilized for this analysis. CDFW staff are available for consultation in support of cumulative impacts analyses as a trustee and responsible agency under CEQA.

Project Alternatives Analysis: CDFW recommends that the information and results obtained from the biological technical surveys, studies, and analysis conducted in support of the Project’s DEIR be used to develop and modify the Project’s alternatives to avoid and minimize impacts to biological resources to the maximum extent possible. When efforts to avoid and minimize have been exhausted, CDFW advises that remaining impacts to sensitive biological resources be mitigated to reduce impacts to a less than significant level, if feasible.

California Natural Diversity Database (CNDDB) Positive Submission of Data: Please note that the CNDDB is populated by voluntary record submissions of species detections. As a result, species may be present in locations not depicted in the CNDDB but where there is suitable habitat and features capable of supporting species. A lack of an occurrence record, or lack of recent occurrence records, in the CNDDB does not mean that a species is not present. In order to adequately assess any potential Project-related impacts to biological resources, surveys conducted by a qualified biologist/botanist during the appropriate protocol survey methodology are warranted in

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order to determine whether or not any special-status species are present at or near the Project site.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDB. The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist San Francisco Planning in identifying and mitigating Project impacts on biological resources. A Mitigation and Monitoring Program (MMRP) (Attachment 1) is included to assist with incorporating the recommended mitigation measures provided above. More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (https://www.wildlife.ca.gov/Conservation/Survey-Protocols). Questions regarding this letter or further coordination should be directed to John Riedel, Environmental Scientist, at (559) 807-1453, or at john.riedel@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Krista Tomlinson
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For Julie A. Vance
Regional Manager

ATTACHMENT 1- MMRP Table

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References

Airola, D., J. Jones, S. Skalos, C. Hunter, J. Estep, R. Williams, and K. Kaynor. 2025. Bald eagle population increase, reproductive success, and nesting habitat in central interior California. California Fish and Wildlife Journal 111:e3.

California Department of Fish and Wildlife. 2026. Biogeographic information and observation system (BIOS). https://www.wildlife.ca.gov/Data/BIOS Accessed 30 June 2026.

Jackman, R. and J. Jenkins. 2004. Protocol for evaluating bald eagle habitat and populations in California. Prepared for U.S. Fish and Wildlife Service, Endangered Species Division, Sacramento, CA, USA.

Thomson, R., A. Wright, and B. Shaffer. 2016. California amphibian and reptile Species of special concern. California Department of Fish and Wildlife and University of California Press: 84–92.

U.S. Forest Service. 2000. Survey protocol for the great gray owl in the Sierra Nevada of California. U.S. Department of Agriculture Forest Service, Pacific Southwest Region, Vallejo, California, USA.

Wu, J., H. Loffland, R. Siegel, and C. Stermer. 2016. A conservation strategy for great gray owls (Strix nebulosa) in California. Interim version 1.0. The Institute for Bird Populations and California Partners in Flight. Point Reyes Station, California.

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Attachment 1

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Attachment 1

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PROJECT: Old Moccasin Powerhouse Hazard Mitigation Project

SCH No.: 2026060680

RECOMMENDED MITIGATION MEASURE	STATUS/DATE/INITIALS
Before Disturbing Soil or Vegetation	
Special-Status Bats (SSB)	
Recommended Mitigation Measure 1: SSB focused surveys	
During Construction	
Special-Status Bats (SSB)	
Recommended Mitigation Measure 2: SSB roost disturbance avoidance and minimization	